

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

TEXAS TRIBUNE, MANO AMIGA, and
CALDWELL/HAYS EXAMINER,

Plaintiffs,

v.

CALDWELL COUNTY, TEXAS,

TREY HICKS, in his official capacity as
Caldwell County Court at Law Judge and
Caldwell County Magistrate,

MATT KIELY, SHANNA CONLEY, ANITA
DELEON, and YVETTE MIRELES, in their
official capacities as Caldwell County Justices
of the Peace and Caldwell County
Magistrates, and

MIKE LANE, in his official capacity as the
Sheriff of Caldwell County,

Defendants.

Civil Action No. 1:23-cv-910-RP

JOINT MOTION TO STAY DEADLINES

NOW COME Plaintiffs, Texas Tribune, Mano Amiga, and Caldwell/Hays Examiner, and Defendants Caldwell County, Texas, Trey Hicks, Matt Kiely, Shanna Conley, Anita DeLeon, Yvette Mireles, and Mike Lane, through their respective attorneys, who jointly move this Court to grant the Parties' Joint Motion to Stay Deadlines, pursuant to Rule 16(b)(4), based on the Parties' ongoing efforts at resolution. In support, the Parties state:

1. Plaintiffs filed their Complaint on August 3, 2023. Dkt. 1.
2. On February 5, 2024, this Court granted Plaintiffs' Motion for Preliminary Injunction. Dkt. 30.

3. On March 25, 2024, this Court entered a scheduling order. Dkt. 38.
4. On August 30, 2024, this Court granted a joint motion to extend deadlines and entered an amended scheduling order. Dkt. 40.
5. On November 15, 2024, the Fifth Circuit Court of Appeals affirmed the preliminary injunction. Dkt. 41.
6. The Parties engaged in efforts to reach resolution between March and May of 2024 and have undertaken further discussions in January and February 2025.
7. Most recently, on February 6, 2025, Plaintiffs completed an inspection of physical property controlled by Defendants.
8. The Parties now believe a negotiated resolution is possible.
9. Given the possible resolution of Plaintiffs' claims, the Parties move to stay all deadlines in the amended scheduling order.
10. The Parties will make a further report regarding the possible resolution of this matter by March 1, 2025.
11. Given this notification of possible settlement of the lawsuit, and the work undertaken by the Parties to achieve resolution, the Parties respectfully request that the Court grant their request to stay current deadlines.
12. These modifications are necessary for the Parties to complete the negotiation process.
13. If the Parties are unable to reach a settlement, they may seek a further brief extension of the deadlines set forth in the amended scheduling order.

WHEREFORE, the Parties respectfully request that the Court grant their Motion and stay current deadlines.

Dated: February 13, 2025

Respectfully submitted,

/s/ Camilla Hsu

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CERTIFICATE OF SERVICE

I hereby certify that on February 13, 2025, a copy of the foregoing was transmitted to all counsel of record in the above-referenced action via electronic filing system.

/s/ Camilla Hsu
One of Plaintiffs' Attorneys

CERTIFICATE OF CONFERENCE

I hereby certify that on February 13, 2025, the undersigned attorney spoke with Defendant's Counsel regarding Defendant's position on this Motion. After discussing its merits, the Parties have agreed to file this Motion jointly.

/s/ Camilla Hsu
One of Plaintiffs' Attorneys